

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CASE NO. 4:21-bk-00802-HWV
	:	
	:	CHAPTER 13
ROBERT SCHNARS,	:	
DEBTOR	:	
	:	DOCKET NO. 7
ROBERT SCHNARS,	:	
MOVANT	:	
	:	
vs.	:	HEARING DATE & TIME:
	:	
ABSOLUTE RESOLUTIONS,	:	
AMERICAN INFO SOURCE,	:	
AMEX,	:	
BEST BUY,	:	
CAVALRY PORTFOLIO,	:	
CITIBANK,	:	
DISCOVER BANK,	:	
FIRST PREMIER BANK,	:	
JEFFERSON CAPITAL,	:	
JPMCB CARD,	:	
LENDING CLUB,	:	
LVNV FUNDING,	:	
MARINER FINANCE,	:	
MIDLAND FUNDING,	:	
NAVY FCU,	:	
NORTHUMBERLAND CO DRS,	:	
PENN CREDIT CORP,	:	
PORTFOLIO RECVOERY,	:	
QUANTUM3 GROUP,	:	
SALLIE MAE BANK,	:	
TD BANK,	:	
US DEPT OF EDUCATION,	:	
WOODLANDS BANK,	:	
	:	
RESPONDENTS	:	FILED PURSUANT TO
	:	11 U.S.C. § 362 (C) (3)
and	:	
	:	
CHARLES J. DEHART, III, ESQ.	:	
CHAPTER 13 TRUSTEE,	:	
	:	
ADDITIONAL	:	
RESPONDENT	:	

MOTION TO EXTEND AUTOMATIC STAY

AND NOW comes the Debtor, Robert Schnars, by and through his attorney, Paul W. McElrath, Esquire, of the law firm of McElrath Legal Holdings, LLC, hereby move this Court, pursuant to 362(c)(3)(B), for an order continuing the automatic stay provided under 362(a) as to all creditors. In support of this motion, the Debtors state as follows:

1. The Debtor is Robert Schnars, one adult individual presently residing at 1435 Tallman Hollow Road Montoursville, PA 17754, Lycoming County.
2. The Debtor filed a prior petition under chapter 13 on November 29, 2019 referenced at case number 19-05102.
3. The Debtor's previously filed chapter 13 case was dismissed on August 24, 2020. This case was dismissed due to non-payment because the Debtor was having financial difficulties. The financial difficulties have been resolved and the Debtor's financial situation has improved dramatically.
4. The Debtor has retained new Counsel.
5. The petition in this case has been filed in good faith. The Debtor believes that the chapter 13 plan he has submitted will be confirmed and that he will be able to fully perform his duties under the terms of the plan.
6. The Debtor's prior chapter 13 case, dismissed on August 24, 2020, was the only previous case by the Debtor that was pending during the preceding year.
7. The Debtors prior chapter 13 case was not dismissed at a time when there had been a motion for relief that was pending before the court or resolved with an order terminating, conditioning, or limiting the stay.
8. The automatic stay in this case expires on May 10, 2021.

WHEREFORE, the Debtor request that this Court continue the automatic stay under 362(a) as to all creditors for the duration of this chapter 13 proceeding, or until such time as the stay is terminated under 362(c)(1) or (c)(2), or a motion for relief in granted under 362(d).

Respectfully submitted,

Date: 4/12/2021

/s/ Paul W. McElrath
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